

**WEIL, GOTSHAL & MANGES LLP**

Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)|  
767 Fifth Avenue  
New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

*Attorneys for Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

**KELLER & BENVENUTTI LLP**

Tobias S. Keller (#151445)  
(tkeller@kellerbenvenuti.com)  
Peter J. Benvenuti (#60566)  
(pbenvenuti@kellerbenvenuti.com)  
Jane Kim (#298192)  
(jkim@kellerbenvenuti.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case) (Jointly Administered)

**DECLARATION OF THEODORE E.  
TSEKERIDES IN SUPPORT OF  
DEBTORS' PRELIMINARY  
OPPOSITION TO TODD HEARN'S  
MOTION FOR RELIEF FROM  
AUTOMATIC STAY**

Date: December 17, 2019  
Time: 10:00 a.m.  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Theodore E. Tsekerides, pursuant to section 1746 of title 28 of the United States Code,  
2 hereby make the following declaration under penalty of perjury:

3 1. I am a Partner at Weil, Gotshal & Manges LLP, counsel to PG&E Corporation and  
4 Pacific Gas and Electric Company (the “Utility”) (collectively, “PG&E” or the “Debtors”) in the  
5 above-captioned chapter 11 cases (“Chapter 11 Cases”). I respectfully submit this *Declaration in*  
6 support of the Debtors’ Preliminary Opposition to Todd Hearn’s Motion for Relief from Automatic  
7 Stay, filed on the date hereof. I am authorized to submit this declaration on behalf of the Debtors.

8 2. Attached hereto as Exhibit A is a true and correct copy of a letter from Vince Magri  
9 to Todd Hearn, dated January 22, 2019.

10 3. Attached hereto as Exhibit B is a true and correct copy of a letter from Sumeet Singh  
11 to Todd Hearn, dated July 17, 2019.

12  
13 Dated: December 12, 2019

/s/ Theodore E. Tsekerides  
Theodore E. Tsekerides